

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNION DEL PUEBLO ENTERO, et al.,

Plaintiffs,

vs.

STATE OF TEXAS, et al.,

Defendants.

NO. 5:21-cv-844-XR

HOUSTON AREA URBAN LEAGUE, et al.

Plaintiffs,

vs.

GREGORY WAYNE ABBOTT, et al.

Defendants.

NO. 5:21-cv-848-XR

HAUL PLAINTIFFS' OBJECTIONS TO DEFENDANTS' PRETRIAL DISCLOSURES

Pursuant to Federal Rule of Civil Procedure 26(a)(3)(B), Plaintiffs Houston Area Urban League, Delta Sigma Theta Sorority, Inc., The Arc of Texas, and Jeffrey Clemmons ("HAUL Plaintiffs") respectfully submit the following objections to State Defendants' Pretrial Disclosures (ECF No. 688), Intervenor-Defendants' Pretrial Disclosures (ECF No. 677), and Defendant Kim Ogg's Pretrial Disclosures (ECF No. 681). The HAUL Plaintiffs also join in any additional objections made by other Plaintiffs that are not included herein.

OBJECTIONS TO STATE DEFENDANTS' DEPOSITION DESIGNATIONS

HAUL Plaintiffs object to the following deposition testimony designated by State Defendants and counter-designate additional deposition testimony.

Witness: Chris Hollins (May 6, 2022)

Designated Testimony (Page:Line)	Objection	Counter-Designation (Page:Line)
11:3-6		
15:7-21	Form. Foundation. Relevance.	
16:2-7		
18:2-16		
18: 23-25		
19:1-5		19:6-11
19:12-25		
20:1-4		20:5-6
23:22-25		
24:1		
24:11-22		
25:3-25		
26:1		
26:12-17		
30:4-8		30:9-15
30:18-25		
31:1-7		
31:23-25		
32:1-9		
33:15-23	Form. Relevance.	
34:15-25	Form. Relevance.	
35:1-9	Form. Relevance.	
35:21-25	Form. Relevance.	
36:4	Form. Relevance. Ambiguous.	
36:14-25	Form. Relevance.	
37:1-4	Form. Relevance.	
37:19-25	Form. Relevance.	
38:1-25	Form. Relevance.	
39:1-9	Form. Relevance.	
39:16-19	Form. Calls for legal conclusion. Relevance.	
39:21-24	Calls for legal conclusion. Form. Relevance.	
40:1-11		
44:2-5		
44:8-25		
45:1-10	Form. Calls for a legal conclusion.	
		45:11-21, 48:17-49:25

Designated Testimony (Page:Line)	Objection	Counter-Designation (Page:Line)
46:16-25	Form. Calls for a legal conclusion. Relevance.	
47:1-12	Form. Calls for a legal conclusion. Relevance.	
50:22-25		
51:1-5		
51:22-25		
52:1-25	Form. Relevance.	
53:1-25	Form. Relevance.	
54:1-5	Form. Relevance.	
		54:6-13
61:5-10		
61:12-25		
62:1-5		62:6-15
62:16-22		
62:25		
63:1-7	Calls for a legal conclusion. Relevance.	
63:12-15	Calls for a legal conclusion. Relevance.	
63:17-25	Calls for a legal conclusion. Relevance.	
64:1-25	Hearsay. Relevance.	
65:1-25	Hearsay. Relevance.	
66:1-21	Form. Relevance.	
67:1-13	Form. Relevance.	
67:18-25	Hearsay. Relevance.	
68:1-25	Hearsay. Relevance.	
69:1-10	Hearsay. Relevance.	
69:21-24	Form. Relevance.	
70:1-25	Form. Relevance.	
71:1-25	Form. Relevance.	
72:1-4	Form. Relevance.	
		72:15-73:1
73:2-25	Calls for a legal conclusion. Form. Relevance.	
74:2-3	Calls for a legal conclusion. Form. Relevance.	
74:2-25	Calls for a legal conclusion. Form. Relevance.	
75:1-4	Form. Relevance.	
76:2-9		
76:11-25		

Designated Testimony (Page:Line)	Objection	Counter-Designation (Page:Line)
77:1-19		77:20-22
78:19-23		78:3-18
79:17-25		
80:1-8	Form. Hearsay. Relevance.	
80:13-22	Form. Hearsay. Relevance.	
81:1-16	Form. Hearsay. Relevance.	
82:17-25	Form. Hearsay. Relevance.	
83:1-25	Form. Hearsay. Relevance.	
84:1-14	Form. Hearsay. Relevance.	
		85:18-86:11
87:14-25		
88:1-5		88:12-89:25
92:4-15	Form. Relevance.	
92:17-18		92:19-25
93:4-6		
93:21-25		
94:1-16		94:17-95:6, 97:23-98:4
102:12-14		
102:16-25		
103:1-25		
104:1-17		
105:12-25		
106:1-22		106:23-25, 107:1-4
107:5-25		
108:1-8		108:9-20
108:23-25	Form. Foundation.	
109:1-2	Form. Foundation.	
109:8-9	Form. Foundation. Calls for speculation.	
109:11-17	Form. Foundation. Calls for speculation.	
109:19-20	Form. Foundation. Calls for speculation.	
110:2-4	Form. Foundation. Calls for speculation.	
110:6-8	Form. Foundation. Calls for speculation.	
		110:13-25, 111:1-4, 112:4-25, 113:1-2, 121:16-25, 122:1-14
125:7-25		
126:1-8	Form.	
		126:9-25
129:25	Form. Relevance.	

Designated Testimony (Page:Line)	Objection	Counter-Designation (Page:Line)
130:1	Form. Relevance.	
130:3-25	Form. Relevance.	
131:1-7	Form. Relevance.	
		132:3-25, 133:1-25, 134:1-24, 141:21-25, 142:1-8
143:17-25	Foundation.	
144:1-7		
144:12-22	Form. Relevance.	
145:1-3	Form. Relevance.	
145:10-25	Form. Relevance.	
146:1-8	Form. Relevance.	
146:14-25	Form. Relevance.	
147:1-6	Form. Relevance.	
147:10-1	Object because it is not clear from the designation which testimony is being designated.	
		150:3-10, 152:4-16, 168:10, 170:20, 171:15-25, 175:14- 176:15
173:15-23		
176:23-25	Form. Relevance.	
177:1-9	Form. Relevance.	
178:1-4		
179:11-20	Form. Relevance.	

Witness: Yvonne Ramon (April 21, 2022; May 10, 2022)

State Defendants have listed Yvonne Ramon as a “may call” witness. Absent an agreement among the parties concerning the use of deposition testimony, pursuant to Federal Rule of Civil Procedure 32(a), HAUL Plaintiffs object to State Defendants’ designations of Ms. Ramon’s deposition testimony in their entirety should she appear live at trial. If Ms. Ramon does not provide live testimony, then HAUL Plaintiffs object only to the following deposition testimony:

Yvonne Ramon Deposition – April 21, 2022

Designated Testimony (Page:Line)	Objection	Counter-designation (Page:Line)
8:10-13		
6-10,23-25		
13:1-25		
14:1-5, 19-25		14:12-18
15:1-25		
16:18-25		
17:1-25		
18:1-25		
19:1-25		
20:1-25		
21:1-25		
22:1-25		
23:1-25		
24:1-6, 14-25		
25:1-25	25:5-9 Relevance. Which party operated the polling locations is not relevant to any claims or defenses in this matter	
26:1-10, 16-25		
27:1-15		
28:1-24		
30:1-17, 22-25		
31:1-18		
33:8-25		
34:1-25		
35:1-25		
36:1-25		
37:1-14		
38:6-10		
39:1-17		39:18-40:2
40:1-24		
41:22-25		
42:1-2, 7-25		
43:1-25		
44:1-7		44:8-12
46:14-24		
47:15-23		
49:20-25		
50:1-6, 10-17		
51:7-25		
52:1-3, 17-25		

Designated Testimony (Page:Line)	Objection	Counter-designation (Page:Line)
53:6-17, 23-25		53:18-22
54:1-13, 18-25		
55:1-25		
56:1,5-25		
37:1-6		57:14-58:5
60:6-24		60:24-61:17 65:5-7
66:1-24		66:25-67:10
67:14-19		
68:20-25		
69:1-25	Hearsay. Foundation.	
70:1-4, 9-25	Foundation.	
71:1-23		
72:6-25		
73:1-14		
74:4-16		74:17-75:2
75:12-24		76:8-12
81:22-25		
82:1-25		
83:1-15, 20-24		
84:1-14		
85:12-23		
86:16-25		
87:1-8		
88:18-24		
89:15-25	Foundation.	
90:1-25		
91:1-23		
93:12-25		
94:1-12		
95:4-23		
97:12-25		
98:1-25		
99:1-25		
100:1-25		
101:19-25		
102:1-25		
103:1		
21:21-25		
112:10-25		
113:1-23		
114:17-25		
115:1		

Designated Testimony (Page:Line)	Objection	Counter-designation (Page:Line)
116:1-16		
119:22-25		
120:1-16		
121:9-25		
122:1-9		
123:17-24		
127:11-20		
129:5-20		
131:7-18		
136:15-25		
137:1-25		
138:1-14		
140:7-25		
141:1-6, 23-25		
142:1-15		142:16-143:15
143:16-25		
144:1-25		
145:1		145:2-25
146:1-4, 11-25		
147:1-2, 12-21		
150:24-25		150:13-23
151:1-25		
152:1-9		
153:8-25		
154:1-25		
155:1-19		155:21-158:15
167:3-8	Foundation	
171:24-25		
172:1-17		
173:10-25		
175:13-18		
177:6-15		177:16-179:5
183:13-25		
184:1-4		
185:19-25		
186:1-8		
207:10-25		
208:1-2		
225:21-25		
226:1-25		
227:1-17		

Yvonne Ramon Deposition – May 10, 2022

Designated Testimony (Page:Line)	Objection	Counter-designation (Page:Line)
21:6-25		
22:1-25		
23:1-12, 23-25		23:13-17
24:1-25		
25:1-8		
31:13-25		
32:1-25		
33:1-25		
34:1-6		
57:18-25		
58:1-25		
59:1-25		
60:1-5		
61:6-25		
62:1-25		
63:1-25		
66:16-25		
67:1-25		
68:1-25		
69:1-8		69:22-70:1
70:2-20		70:25-71:4
97:17-25		
98:1-2		
99:24-25		
100:1-15		
151:16-25		
152:1-25		
153:1-22		
157:5-15		
158:3-11		
165:9-15		
175:20-23		
178:7-25		
179:1-10, 22-25		
180:1-5		
184:7-20		
186:24-25		
187:1-11		
221:21-25		
222:1-18		
230:7-25		

Designated Testimony (Page:Line)	Objection	Counter-designation (Page:Line)
231:1-9	Foundation	
255:10-24		

Witness: Isabel Longoria (April 20, 2022; April 22, 2022)

Private Plaintiffs have listed Isabel Longoria as “may call” witness. (ECF No. 687-1.) Absent an agreement among the parties concerning the use of deposition testimony, pursuant to Federal Rule of Civil Procedure 32(a), HAUL Plaintiffs object to State Defendants’ designations of Ms. Longoria’s deposition testimony in their entirety should she appear live at trial. If Ms. Longoria does not provide live testimony, then HAUL Plaintiffs object only to the following deposition testimony:

Isabel Longoria Deposition – April 20, 2022

Designated Testimony (Page:Line)	Objection	Counter-Designation (Page:Line)
8:22–25	None	
9:22–25	None	
10:1–16	None	
11:4–15	None	
13:18–25	None	
14:1–13, 20 – 25	None	
15:1–25	Incomplete	16:1-5
16:11–25	None	
17:1 – 25	None	
18:1–14	None	
19:7–25	None	
20:1–13, 19–20, 24–25	Incomplete	20:14-18
21:1–25	None	
22:1–24	None	
25:16–19	Incomplete	See below
29:14–20	Incomplete	26:22-29:13; 29:21-25
30:4–7	Incomplete	30:1-3; 30:8-25
31:25	Incomplete	31:1-24

Designated Testimony (Page:Line)	Objection	Counter-Designation (Page:Line)
32:1–19	Incomplete	32:20-33:19
33:20–24	Incomplete	33:25
34:25	Incomplete	34:1-24; 38:2-8
35:1–10	None	
36:9–14	None	
48:11–23	Incomplete	46:25-47:7; 48:3-10; 48:24-50:1.
50:22–25	Incomplete	
51:1–11	Incomplete	51:12-52:8
52:22–25	Incomplete	See above
53:1–3	Incomplete	See above
54:20-24	None	
57:21–25	None	
58:1–18	None	
61:13–17	None	
63:11–25	Incomplete, Hearsay	130:6-14 and Longoria April 20, 2022 Afternoon Deposition at 31:20-32:6; 32:10-34:15; 34:18-38:10; 38:16-44:7; 44:11-49:14.
64:1–5, 22–24	None	
65:8–14	Incomplete, Hearsay	130:6-14 and Longoria April 20, 2022 Afternoon Deposition at 31:20-32:6; 32:10-34:15; 34:18-38:10; 38:16-44:7; 44:11-49:14.
66:15–19, 24–25	Incomplete, Hearsay	See above
67:1–6	Hearsay	
69:22–25	Incomplete	See below
70:1–3, 23–25	Incomplete	70:4-22
71:1–22	Incomplete	71:23-72:25
73:1–3	Incomplete	73:4-74:8
74:20–25	None	
75:1–8	None	
76:4–18	None	
82:18–23	None	
86:16–22	Incomplete	85:20-86:15; 86:25-88:25; 89:15-24
93:7–20	Irrelevant	
94:13–25	None	
95:1–22	None	

Designated Testimony (Page:Line)	Objection	Counter-Designation (Page:Line)
96:2-25	None	
97:1-13	None	
99:3-11, 25	Incomplete, irrelevant	99:12-24
100:1-25	Irrelevant	
101:1-8	Irrelevant	
102:5-13, 21-25	Irrelevant	
103:1-19	Irrelevant	
104:3-14, 23-25	Irrelevant	
105:1-5	Irrelevant	
106:7-19	Irrelevant	
107:9-25	Irrelevant	
108:1-18	Irrelevant	
111:3-25	Irrelevant	
112:1-3	Irrelevant	
114:22-25	Irrelevant	
115:1-12, 15-25	Irrelevant Irrelevant	
116:1-13, 16-22	Irrelevant Irrelevant	
119:2-25	Irrelevant	
120:1-25	Irrelevant, Hearsay	
121:1-17, 20-25	Irrelevant, Hearsay	
122:1-7, 17-25.	Irrelevant, Hearsay Irrelevant, Hearsay	
123:10, 16-18, 23-25	Irrelevant, Hearsay	
124:1-14	Irrelevant, Hearsay	
125:3-5, 10-25	Irrelevant, Hearsay	
132:14-25	None	
133:1	None	
134:4-14	Incomplete	134:15-136:8
135:9-18	Incomplete	135:19-136:13
137:13-25	None	
138:1-2	None	
139:14-25	None	
140:1-12	None	
140:21-25	Incomplete	See below
142:1-5, 9-25	Incomplete	142:6-8
143:1-25	None	
144:1-5, 8-25	None	
145:1-16, 19-25	As to 145:14-25, improper question	
146:1-25	See above	
147:1-5	As to 147:1-2 see above;	

Designated Testimony (Page:Line)	Objection	Counter-Designation (Page:Line)
	as to 147:3-5: incomplete	147:6-148:1 & 131:9-21
148:16-21, 24-25	None	
149:1-25	149:1-16 None 149:17-25 Incomplete	See below
150:1, 7-25	Incomplete	See below
151:1-23	Incomplete	151:24-153:25
154:1-14	Incomplete	154:15-155:6
155:7-13, 25	Incomplete	See above and 155:1-6 , 155:14-24 and Longoria April 20, 2022 Afternoon Deposition at 16:10-17:9, 18:16-17, 19:1-11, and Exhibits 11 & 12.
156:1-7	Incomplete	156:8-15
158:24-25	Incomplete	158:6-23
159:1-9, 17-25	Incomplete	See above
160:1-2	Incomplete	See above

Isabel Longoria Deposition – April 22, 2023

Designated Testimony (Page:Line)	Objection	Counter-Designation (Page:Line)
77:9-10, 24-25	None	
73:1-9	Designation makes no sense: there is no page 73 in this transcript	
77:15-21	Irrelevant	
79:17	Designation makes no sense: just one line of a question	
80:1-24	Incomplete	81:2-82:24
82:25	Incomplete	See above
83:1-19	Incomplete	See above
85:18-25	None	
86:1-21	None	
87:16-25	None	Ex. 15 must be proffered with these pages
88:1-23	None	Ex. 15 must be proffered with these pages.
97:17-20	None	
98:3-15	None	
99:1-8	None	

Designated Testimony (Page:Line)	Objection	Counter-Designation (Page:Line)
99:10–25	None	
100:1–25	None	
100:1–13	Incomplete	101:14-25
102:1–6	None	
103:18–23, 25	None	
104:1–3, 13–25	None	
105:1–13, 15–25	None	
106:101–8	None	
107:2–22	Incomplete	107:23-10-111:1
108:23–25	Incomplete	See above
109:1–8	Incomplete	See above
111:10–25	Incomplete	See below
112:1–7	Incomplete	112:9-113:15
113:16–25	Incomplete	See below
114:1, 14–21	Incomplete	114:22-25
115:13–25	Incomplete	115:1-12
116:1–25	None	
117:1–22, 24–25	None	
118:1–7	Incomplete	118:8-25
119:13–25	None	
120:1–13	None	

OBJECTIONS TO STATE DEFENDANTS' EXHIBITS

Will Offer

STATE DEFENDANTS' NO.	DESCRIPTION	OBJECTION
1	Signed and executed copy Senate Bill 1. https://webservices.sos.state.tx.us/legbills/files/C287/SB1.pdf .	None
2	Expert Witness Report, Prof. Mark Hoekstra, Response to Prof. Eitan Hersh's February 10, 2023, Second Supplemental Report. (Served on Mar. 3, 2023)	None, provided the expert is found qualified under FRE 702

STATE DEFENDANTS' NO.	DESCRIPTION	OBJECTION
3	Expert Witness Report, Prof. Mark Hoekstra, <i>Response to Prof. Eitan Hersh's February 28, 2022, Initial Report.</i> (Served on Mar. 29, 2022).	None, provided the expert is found qualified under FRE 702
4	Notice of Correction to March 29, 2022, Expert Report of Prof. Mark Hoekstra, Ph.D., Written in Response to the February 28, 2022, Report by Prof. Eitan Hersh. (Served on Apr. 25, 2023).	None, provided the expert is found qualified under FRE 702
5	Expert Witness Report, Prof. Mark Hoekstra, <i>Response to Prof. Christian Grose's February 10, 2023, Supplemental Report.</i> (Served on Mar. 3, 2023)	None, provided the expert is found qualified under FRE 702
6	Expert Witness Report, Prof. Mark Hoekstra, <i>Response to Prof. Christian Grose's February 28, 2022, Initial Report.</i> (Served on Mar. 29, 2022).	None, provided the expert is found qualified under FRE 702
7	Notice of Correction to March 29, 2022, Expert Report of Prof. Mark Hoekstra, Written in Response to the February 28, 2022, Report by Prof. Christian Grose. (Served on Apr. 25, 2023).	None, provided the expert is found qualified under FRE 702
8	Expert Witness Report, Prof. Mark Hoekstra, <i>Response to Prof. Eric McDaniel's February 10, 2023, Second Supplemental Report.</i> (Served on Mar. 3, 2023).	None, provided the expert is found qualified under FRE 702
9	Expert Witness Report, Prof. Mark Hoekstra, Response to Prof. Eric McDaniel's February 28, 2022, Initial Report. (Served on Mar. 29, 2022).	None, provided the expert is found qualified under FRE 702
10	Expert Witness Report, Prof. Mark Hoekstra, <i>Response to Prof. Kenneth R. Mayer's March 6, 2023, Supplemental Report.</i> (Served on Apr. 5, 2023).	None, provided the expert is found qualified under FRE 702
11	Notice of Correction to April 5, 2023, Expert Report of Prof. Mark Hoekstra, PhD, Written in Response to the March 6, 2023, Report by Prof. Kenneth Mayer. (Served on Apr. 25, 2023).	None, provided the expert is found qualified under FRE 702

STATE DEFENDANTS' NO.	DESCRIPTION	OBJECTION
12	Expert Witness Report, Dr. Stephen C. Graves. (Served on Mar. 29, 2022).	None, provided the expert is found qualified under FRE 702
13	Election Advisory No. 2021-18, Re: Revised: March 1, 2022, Primary Election and May 24, 2022, Primary Runoff Election Law Calendar, dated November 12, 2021. (STATE097860–908).	Authenticity, Hearsay
14	Election Advisory No. 2021-21, Re: Legislative Summary – Second and Third Special Sessions, dated November 19, 2021. (STATE001483–502).	None
15	Election Advisory No. 2021-23, Re: May 7, 2022, Election Law Calendar, dated December 10, 2021. (STATE097909–48).	Hearsay
16	Election Advisory No. 2022-07, Re: NEW LAW: Changes to Early Voting by Personal Appearance – House Bill 2025, House Bill 3107, and Senate Bill 1, dated January 21, 2022. (STATE001577–93)	None
17	Election Advisory No. 2022-08, Re: NEW LAW: Senate Bill 1 – Opportunity to Correct Defects on Application for a Ballot by Mail and Carrier Envelope, dated November 19, 2021. (STATE034294–321)	None
18	Election Advisory No. 2022-09, NEW LAW: Changes to Poll Watcher Requirements Under House Bill 3107 and Senate Bill 1, dated February 4, 2022. (STATE060559)	None
19	Election Advisory No. 2022-12, Re: Additional Procedures Regarding Correction of Defects on Application for Ballot by Mail or Carrier Envelope, dated February 11, 2022. (STATE001469–73).	None

STATE DEFENDANTS' NO.	DESCRIPTION	OBJECTION
20	Election Advisory No. 2022-18, Re: Additional Ballot by Mail Procedures for May Uniform Election and Primary Runoff Election, dated April 26, 2022. (STATE087955-58)	None
21	Election Advisory No. 2022-25, Re: November 8, 2022, Election Law Calendar, dated June 20, 2022, dated June 20, 2022. (STATE122992-3039)	Hearsay
22	Spreadsheet created by Secretary of State in response to media inquiries, listing mail-ballot rejection rates for 2022 elections. (STATE115581-616).	Foundation, Authenticity, Hearsay, 403
23	Final Report on Audit of 2020 General Election in Texas. (STATE115222-580).	Foundation, Authenticity, Hearsay, 403
24	Executive Summary to Audit 2020 General Election in Texas (STATE115212-221).	Foundation, Authenticity, Hearsay, 403
25	Harris County Post Election Assessment of the November 8, 2022, General Election. (STATE170230-83).	Foundation, Authenticity, Hearsay, 403
26	Handbook for Election Judges and Clerks, <i>Qualifying Voters on Election Day 2022</i> , Secretary of State, revised July 2022. (STATE110976-1056).	None
27	Handbook for Election Judges and Clerks, <i>Early Voting Ballot Board & Signature Verification Committee</i> , Secretary of State, revised July 2022. (Exhibit 17 – February 28, 2023, Dep. of Jacquelyn Callanen).	Misidentified; unable to identify document based on description; all objections reserved
28	Poll Watcher's Guide, Secretary of State, revised January 2022. (STATE106313-337).	None

STATE DEFENDANTS' NO.	DESCRIPTION	OBJECTION
29	Draft of Poll Watcher Online Training, Secretary of State, January 20, 2022 (STATE035175–90).	Authenticity, Hearsay, Relevance, 403
30	Texas Voter Registration Application (Spanish) (STATE046251–52).	None
31	Texas Voter Registration Application (English) (STATE046253–54).	None
32	Federal Post Card Application (Exhibit 3 – July 29, 2022, Dep. of Scott Wiedmann).	Relevance
33	Federal Write-In Absentee Ballot (Exhibit 4 – July 29, 2022, Dep. of Scott Wiedmann).	Relevance
34	Form 4-20, Certificate of Appointment of Poll Watcher by a Candidate, January 2022. (STATE060813–14).	None
35	Form 4-21, Certificate of Appointment of Poll Watcher by Political Party, January 2022. (STATE060815–16).	None
36	Form 4-22, Certificate of Appointment of Poll Watcher for Propositions or Measures, January 2022 (STATE060817–16).	Completeness, Authenticity
37	Form 4-23, Certificate of Appointment of Poll Watcher by Registered Voters on Behalf of a Write-In Candidate, January 2022 (STATE060819–20).	None

STATE DEFENDANTS' NO.	DESCRIPTION	OBJECTION
38	Form 5-21, Ballot Envelope (For Secrecy), January 2022. (STATE061390–91).	None
39	Form 6-2, Notice of Rejected Application for Ballot by Mail, January 2022. (STATE031641–42).	None
40	Form 6-3, Notice of Rejected Application for Ballot by Mail - Missing or Incorrect Personal Identification Numbers, January 2022. (STATE031643–44).	None
41	Form 6-4, Notice of Rejected Application for Ballot by Mail - Required Personal Identification Number is Not Associated with Your Voter Record, January 2022. (STATE074329–30).	None
42	Form 6-6, Request to Cancel Application for Ballot by Mail – Early Voting Clerk’s Form, January 2022. (STATE091410–11).	None
43	Form 6-11, EVC Notice of Carrier Defect Mailed with Corrective Action Form (Spanish), April 2022. (STATE123304–06).	None
44	Form 6-11, EVC Notice of Carrier Defect Mailed with Corrective Action Form (English), April 2022. (STATE123307–09).	None
45	Form 6-12, EVC Notice of Carrier Defect Phone with Corrective Action Form (Spanish), April 2022. (STATE123310–12).	None
46	Form 6-12, EVC Notice of Carrier Defect Phone with Corrective Action Form (English), April 2022. (STATE123313–15).	None

STATE DEFENDANTS' NO.	DESCRIPTION	OBJECTION
47	Form 6-13, Notice of Surrendered Ballot by Mail, January 2022. (STATE034285).	None
48	Form 6-14, Corrective Action Form for Defective Carrier Envelope, January 2022. (STATE034286).	None
49	Form 6-15, Carrier Envelope for Early Voting Ballot (regular ABBM), July 2022. (STATE138768–70).	None
50	Form 6-17, Information about Returning Your Carrier Envelope, January 2022. (STATE074293–94).	None
51	Form 6-35, Notes for Carrier Envelope (FPCA), January 2022. (STATE01634).	Misidentified; unable to identify document based on description; all objections reserved.
52	Form 6-36, Information about Returning Your Voted Mail Ballot (FPCA Insert), January 2022. (STATE031652–53).	None
53	Form 6-37, Official Election Signature Sheet for an FPCA Voter, December 2021 (English/Spanish). (STATE001643–44).	None
54	Form 7-33 (AW7-7b), Notice of Voting Order Priority, January 2022. (STATE033209)	Misidentified; unable to identify document based on description; all objections reserved.
55	Form 7-58, Oath of Assistance and Interpreter, July 2022. (STATE138771–72).	None

STATE DEFENDANTS' NO.	DESCRIPTION	OBJECTION
56	Form 7-59, Information of Person that Provided Transportation to Seven or More Voters for Curbside Voting, October 2022. (Exhibit 9 – March 21, 2023, Dep. of Lauren Smith).	None
57	Form 8-15, Notice of Rejected Ballot, January 2022. (STATE152170).	None
58	Form 8-20, Roster of Voters with Defective Carrier Envelopes – Returned to the Voter by Mail, January 2022. (STATE034287).	None
59	Form 8-21, Roster of ABBM Voters with Defective Carrier Envelopes – Notified by Phone or Email, January 2022. (STATE034288).	None
60	Form 8-22, Roster of FPCA Voters with Defective Carrier Envelopes – Notified by Phone or Email, January 2022. (STATE034289).	None
61	Form 8-23, Notice of Carrier Defect – Carrier Envelope Returned to the Voter by Mail, January 2022. (STATE034290).	None
62	Form 8-24, Notice of Carrier Defect – Vote Notified of Carrier Envelope Defect by Phone or Email, January 2022. (STATE034292).	None
63	Instructions for Form 9-12, Preliminary Election Reconciliation - Unofficial Totals (Election Day), February 2022. (STATE019487–488).	None
64	Form 9-12, Preliminary Election Reconciliation - Unofficial Totals (Election Day), February 2022. (STATE019489).	None

STATE DEFENDANTS' NO.	DESCRIPTION	OBJECTION
65	Form 9-13, Election Reconciliation Form – Official Results (Canvass Form) February 2022. (STATE019490).	None
66	Instructions for Form 9-13, Election Reconciliation Form - Official Results (Canvass Form), February 2022. (STATE019491–92).	None
67	January 18, 2022, Email from Election Security Trainer Alexa Buxkemper to Legal Director Christina Adkins, Re: How many forms (STATE033331–32).	Hearsay, Authenticity, 401
68	Carrier Envelope Insert utilized by Denton County to remind voters of ID number requirement. (STATE154278).	None
69	Carrier Envelope Insert utilized by Travis County to remind voters of ID number requirement. (064.134768–69).	None
70	Carrier Envelope Insert utilized by Travis County to remind voters of ID number requirement. (064.134775–76).	None
71	ABBM Insert utilized by Travis County to remind voters of ID number requirement. (064.134766–67).	Hearsay. Authentication/Lack of Foundation.
72	ABBM Insert with Numbers utilized by Travis County to remind voters of ID number requirement. (064.134773–74).	Hearsay. Authentication/Lack of Foundation.
73	Carrier Envelope Insert utilized by Harris County in 2022 Primaries to remind voters of ID number requirement (English/Spanish). (TATUM_005333–34).	Hearsay. Authentication/Lack of Foundation.

STATE DEFENDANTS' NO.	DESCRIPTION	OBJECTION
74	Carrier Envelope Insert utilized by Harris County to remind voters of ID number requirement (Chinese/English). (TATUM_005335–36).	Hearsay. Authentication/Lack of Foundation.
75	Carrier Envelope Insert utilized by Harris County to remind voters of ID number requirement (Spanish/English). (TATUM_005337–38).	Hearsay. Authentication/Lack of Foundation.
76	Carrier Envelope Insert utilized by Harris County to remind voters of ID number requirement (Vietnamese/English). (TATUM_005337–38).	Hearsay. Authentication/Lack of Foundation.
77	Carrier Envelope Insert utilized by Bexar County in the May 7, 2022, Local Election and May 24, 2022, Primary Runoff to remind voters of ID number requirement. (Exhibit C – April 20, 2022, Dep. of Jacquelyn Callanan).	Hearsay. Authentication/Lack of Foundation.
78	Carrier Envelope Insert utilized by Bexar County in the November 8, 2022, General Election to remind voters of ID number requirement. (Exhibit 13 – February 28, 2023, Dep. of Jacquelyn Callanan).	Hearsay. Authentication/Lack of Foundation.
79	Carrier Envelope Insert utilized by Hays County to remind voters of ID number requirement. (STATE139500–01).	Hearsay. Authentication/Lack of Foundation.
80	Carrier Envelope Insert utilized by Kleberg County to remind voters of ID number requirement. (STATE142722).	Hearsay. Authentication/Lack of Foundation.
81	ABBM Insert utilized by Kleberg County to remind voters of ID number requirement. (STATE140753).	Hearsay. Authentication/Lack of Foundation.
82	CONFIDENTIAL Election Fraud Violations Chart, Office of the Attorney General, updated April 20, 2022. (STATE112177–93).	Hearsay. Authentication/Lack of Foundation. Rule 403.

STATE DEFENDANTS' NO.	DESCRIPTION	OBJECTION
83	CONFIDENTIAL Instances of Suspected Illegal Voting Since March 1, 2018 – Cases Opened, Office of the Attorney General. (STATE112155–57).	Hearsay. Authentication/Lack of Foundation. Rule 403.
84	CONFIDENTIAL Case Tracking Spreadsheet, Election Integrity Unit, Office of the Attorney General. (STATE112158–59).	Hearsay. Authentication/Lack of Foundation. Rule 403.
85	2020 Complaint Log, Secretary of State (STATE078234).	Hearsay. Authentication/Lack of Foundation. Rule 403.
86	2016–2019 Complaint Log, Secretary of State (STATE078237).	Hearsay. Authentication/Lack of Foundation. Rule 403.
87	Election Fraud Complaints Referred for Investigation: SOS Referrals, updated May 10, 2022. (STATE107717–32).	Hearsay. Authentication/Lack of Foundation. Rule 403.
88	March 11, 2021, Email from Director of Government Relations Ryan Fisher at the Office of Attorney General to Jessica Hart; Re: OAG Election Fraud Section. (STATE090960).	Hearsay. Authentication/Lack of Foundation. Rule 403.
89	PowerPoint Presentation, <i>Election Integrity</i> . (STATE054622–77).	Hearsay. Authentication/Lack of Foundation. Rule 403.
90	Indictment, <i>Texas v. Ward</i> , Cause No. 50947-B (STATE098012–14).	Hearsay. Relevance. Authentication/Lack of Foundation. Rule 403. Incomplete.
91	Indictment, <i>Texas v. Jackson</i> , Cause No. 50949-B (STATE097980–98000).	Hearsay. Relevance. Authentication/Lack of Foundation. Rule 403. Incomplete.

STATE DEFENDANTS' NO.	DESCRIPTION	OBJECTION
92	Indictment, <i>Texas v. Burns</i> , Cause No. 50951-B (STATE098008–11).	Hearsay. Relevance. Authentication/Lack of Foundation. Rule 403. Incomplete.
93	Indictment, <i>Texas v. Brown</i> , Cause No. 50953-B (STATE098001–07).	Hearsay. Relevance. Authentication/Lack of Foundation. Rule 403. Incomplete.
94	Indictment, <i>Texas v. Molina</i> , W-19-0134-J22. (STATE098413–18).	Hearsay. Relevance. Authentication/Lack of Foundation. Rule 403. Incomplete.
95	Indictment, <i>United States v. Orellana</i> , Case No. 9:18-cr-00020 (STATE098510–15).	Hearsay. Relevance. Authentication/Lack of Foundation. Rule 403. Incomplete.
96	Judgment in a Criminal Case, <i>United States v. Orellana</i> , Case No. 9:18-cr-00020 (STATE098516–22).	Hearsay. Relevance. Authentication/Lack of Foundation. Rule 403.
97	Plea Agreement, <i>United States v. Orellana</i> , Case No. 9:18-cr-00020 (STATE098523–32).	Hearsay. Relevance. Authentication/Lack of Foundation. Rule 403.
98	Warrant of Arrest, <i>Texas v. Molina</i> , W-19-0134-J22. (STATE098537–44).	Hearsay. Relevance. Authentication/Lack of Foundation. Rule 403.
99	Agreement, OAG Prosecution Diversion Program, related to illegal voting, signed March 8, 2022. (STATE087320).	Hearsay. Relevance. Authentication/Lack of Foundation. Rule 403.
100	Agreement, OAG Prosecution Diversion Program, related to unlawful assistance, signed June 6, 2018. (STATE087340).	Hearsay. Relevance. Authentication/Lack of Foundation. Rule 403.

STATE DEFENDANTS' NO.	DESCRIPTION	OBJECTION
101	Agreement, OAG Prosecution Diversion Program, related to illegal voting and false information on government record, signed October 28, 2021. (STATE087342).	Hearsay. Relevance. Authentication/Lack of Foundation. Rule 403.
102	Agreement, OAG Prosecution Diversion Program, related to illegal voting and false information on government record, signed August 14, 2020. (STATE087345).	Hearsay. Relevance. Authentication/Lack of Foundation. Rule 403.
103	Agreement, OAG Prosecution Diversion Program, related to illegal voting and false information on government record, signed August 19, 2020. (STATE087360).	Hearsay. Relevance. Authentication/Lack of Foundation. Rule 403.
104	Agreement, OAG Prosecution Diversion Program, related to illegal voting and false information on government record, signed June 5, 2018. (STATE087365).	Hearsay. Relevance. Authentication/Lack of Foundation. Rule 403.
105	Agreement, OAG Prosecution Diversion Program, related to unlawful assistance, signed June 15, 2018. (STATE087341).	Hearsay. Relevance. Authentication/Lack of Foundation. Rule 403.
106	Agreement, OAG Prosecution Diversion Program, related to failure to sign application as a witness, signed May 19, 2021. (STATE087373).	Hearsay. Relevance. Authentication/Lack of Foundation. Rule 403.
107	Agreement, OAG Prosecution Diversion Program, related to violations of Tex. Elec. Code §§ 64.012 and 276.013, signed August 5, 2019. (STATE087375).	Foundation; Authenticity; Hearsay; Relevance. 403
108	Agreement, OAG Prosecution Diversion Program, related to false information on application for ballot by mail, signed June 26, 2018. (STATE087376).	Foundation; Authenticity; Hearsay; Relevance. 403
109	Agreement, OAG Prosecution Diversion Program, related to false information on application for ballot by mail, signed June 25, 2018. (STATE087377)	Foundation; Authenticity; Hearsay; Relevance. 403

STATE DEFENDANTS' NO.	DESCRIPTION	OBJECTION
110	Agreement, OAG Prosecution Diversion Program, related to false information on application for ballot by mail, signed June 25, 2018. (STATE087380).	Foundation; Authenticity; Hearsay; Relevance. 403
111	Agreement, OAG Prosecution Diversion Program, related to illegal voting and false information on application for ballot by mail, signed July 25, 2018. (STATE087381).	Foundation; Authenticity; Hearsay; Relevance. 403
112	Agreement, OAG Prosecution Diversion Program, related to illegal voting and false information on application for ballot by mail, signed July 25, 2018. (STATE087381).	Foundation; Authenticity; Hearsay; Relevance, 403 and EX. 112 is a duplicate of EX. 111.
113	Agreement, OAG Prosecution Diversion Program, related to false information on application for ballot by mail, signed September 17, 2018. (STATE087386).	Foundation; Authenticity; Hearsay; Relevance. 403
114	Agreement, OAG Prosecution Diversion Program, related to false information on application for ballot by mail, signed June 26, 2018. (STATE087391).	Foundation; Authenticity; Hearsay; Relevance. 403
115	Agreement, OAG Prosecution Diversion Program, related to false information on application for ballot by mail, signed June 26, 2018. (STATE087392).	Foundation; Authenticity; Hearsay; Relevance. 403
116	Agreement, OAG Prosecution Diversion Program, related to false information on application for ballot by mail, signed June 26, 2018. (STATE087393).	Foundation; Authenticity; Hearsay; Relevance. 403
117	Final Judgment, <i>Rangle v. Rodriguez</i> , NO. 2022CVK001669D1 (49th Dist. Ct., Webb County, Feb. 2, 2023) (STATE184628–37).	Foundation; Authenticity; Hearsay; Relevance.
118	United States' Responses to Texas's First Set of RFPs – Privilege Log (Exhibit 10 – May 9, 2022, Dep. of Remi Garza).	Hearsay, Relevance.

STATE DEFENDANTS' NO.	DESCRIPTION	OBJECTION
119	November 4, 2013, Press Release from FBI San Antonio Field Office, Re: Former Cameron County Woman Convicted of Voter Fraud. (STATE107789).	Foundation; Authenticity; Hearsay; Relevance.
120	June 5, 2014, Press Release from Department of Justice U.S. Attorney's Office Southern District of Texas, Re: Campaign Worker Pleads Guilty To Buying Votes In Donna School Board Election. (STATE107844-45)	Foundation; Authenticity; Hearsay; Relevance.
121	June 19, 2014, Press Release from Department of Justice, Re: Campaign Manager Charged with Buying Votes in a Donna, Texas, School Board Election. (STATE097645-46)	Foundation; Authenticity; Hearsay; Relevance.
122	December 1, 2014, Press Release from FBI San Antonio Field Office, Re: Campaign Manager Pleads Guilty to Conspiracy to Buy Votes in a Donna, Texas School Board Election. (STATE107785)	Foundation; Authenticity; Hearsay; Relevance.
123	House Journal, Eightieth Legislature, Regular Session, Sixtieth Day – Monday April 23, 2007. (STATE098214-75).	Foundation; Authenticity; Hearsay; Relevance.
124	Transcript of Texas Senate Committee on State Affairs, March 18, 2019, Hearing, Re: Senate Bill 9. (STATE098545-658).	Foundation; Authenticity; Hearsay; Relevance.
125	December 3, 2018, Letter from Senator Judith Zaffirini to Senator Bryan Hughes regarding Senate Select Committee on Election Security. (STATE108349-50).	Foundation; Authenticity; Hearsay; Relevance.
126	Chuck DeVore, <i>The Role of Voter List Maintenance and Voter Identification in Election Integrity</i> , Texas Public Policy Foundation, March 2021. (TXLEG_0001066).	Hearsay, 403

STATE DEFENDANTS' NO.	DESCRIPTION	OBJECTION
127	July 22, 2020, Letter from Harris County Clerk Chris Hollins to Governor Greg Abbott, Re: Extended Early Voting Days for November 2020 Election. (STATE098283).	None
128	Governor's Proclamation, dated July 27, 2020, suspending certain statutes concerning elections on November 3, 2020. (STATE098533-36).	None
129	Governor Proclamation, dated October 1, 2020, suspending certain statutes concerning the November 3, 2020, elections. (Exhibit 3 – May 6, 2022, Dep. of Chris Hollins).	None
130	Complaint, ECF 1, <i>Tex. League of United Latin Am. Citizens v. Abbott</i> , 493 F. Supp. 3d 548, 567 (W.D. Tex. 2020), vacated sub nom. <i>Tex. League of United Latin Am. Citizens v. Hughs</i> , No. 20-50867, 2021 WL 1446828 (5th Cir. Feb. 22, 2021). (Exhibit 4 – May 6, 2022, Dep. of Chris Hollins).	403
131	Justice Devine Dissent, <i>In re Hotze</i> , et al., No. 20-0751, 627 S.W.3d 652 (Tex. 2020). (Exhibit 13 – October 6, 2022, Dep. of Sen. Carol Alvarado).	403
132	August 25, 2020, Tweet from Harris County Elections about unsolicited ABBMS. (Exhibit 6 – May 6, 2022, Dep. of Chris Hollins).	None
133	August 27, 2020, Letter from Director of Elections Keith Ingram to Harris County Clerk Chris Hollins about unsolicited ABBMS. (Exhibit 3 – October 6, 2022, Dep. of Sen. Carol Alvarado).	403
134	Petition, <i>State v. Hollins</i> , NO. 14-20-00627- CV (127th Dist. Ct., Harris County, Tex. Aug. 31, 2020). (Exhibit 7 – May 6, 2022, Dep. of Chris Hollins).	Hearsay, 408-03

STATE DEFENDANTS' NO.	DESCRIPTION	OBJECTION
135	August 31, 2020, Letter from Charles K. Eldred to Seth Hopkins about Rule 11 Agreement in <i>State v. Hollins</i> . (Exhibit 8 – May 6, Dep. of Chris Hollins).	Hearsay, 401-03, 408
136	Opinion, <i>State v. Hollins</i> , 620 S.W.3d 400, 403 (Tex. 2020). (Exhibit 9 – May 6, 2022, Dep. of Chris Hollins).	Hearsay, 401-03, 408
137	Webpage, <i>Drive-Thru Voting</i> , HARRIS COUNTY ELECTION DIVISION, https://harrisvotes.com/drivethruvoting . (STATE097764–67) (Exhibit 10 - May 6, 2022, Dep. of Chris Hollins).	None
138	October 16, 2020, Letter from Attorney General Ken Paxton to Texas Election Officials about drive-thru voting. (Exhibit 7 – October 6, 2022, Dep. of Sen. Carol Alvarado).	403
139	Petition for Writ of Mandamus, <i>In re Hotze</i> , et al, No. 20-0819, 610 S.W.3d 909 (Tex. 2020). (Exhibit 11 – May 6, 2022, Dep. of Chris Hollins).	403
140	Justice Devine Dissent, <i>In re Hotze</i> , et al, No. 20-0819, 610 S.W.3d 909 (Tex. 2020). (STATE098278–82).	Hearsay, 403
141	Map of 24-Hour Voting Locations in Harris County during November 2020 General Election. (STATE097483).	403
142	Map of Drive Thru Voting Locations in Harris County during November 2020 General Election. (STATE097763).	403
143	September 10, 2020, Email from Elections Division Attorney Charles Pinney to Assistant Director Dan Hayes, Re: Travis County Central Count Accommodations for Poll Watchers. (STATE092408–09).	Hearsay, Authenticity, foundation

STATE DEFENDANTS' NO.	DESCRIPTION	OBJECTION
144	Picture taken of sequestered poll watchers in Travis County's central count during November 2020 General Election. (Exhibit 16 – May 11, 2022, Dep. of Bridgette Escobedo).	Misidentified; cannot identify exhibit based on information provided; all objections reserved
145	Emergency Petition for Writ of Mandamus, <i>In re Mackowiak, et al.</i> , No. 20-0889 (Tex. 2020). (STATE098659–724).	403
146	Brief of the Texas Attorney General, <i>In re Mackowiak, et al.</i> , No. 20-0889 (Tex. 2020). (STATE097484–90).	403
147	Rule 11 Agreement between Relators and Respondent, <i>In re Mackowiak, et al.</i> , No. 20-0889 (Tex. 2020). (STATE097978–79).	403
148	November 11, 2020, Press Release, <i>Travis County Candidate Settles with Travis County Clerk</i> , Martin Harry for District Attorney. (STATE098419)	Hearsay
149	December 8, 2022, Letter from Harris County Election Administrator Clifford Tatum to Secretary of State John Scott, about Countywide Polling Place Program. (STATE122932–36).	Hearsay, Authenticity, foundation, 401
150	Harris County November 6, 2018, General and Special Elections Early Voting Schedule. (STATE170226).	None
151	Harris County November 3, 2020, General and Special Elections Early Voting Schedule. (STATE098175–76) (Exhibit 13 – May 6, 2022, Dep. of Chris Hollins).	None
152	Harris County Early Voting Polling Location List for November 3, 2020, General and Special Elections. (STATE098209–213).	None

STATE DEFENDANTS' NO.	DESCRIPTION	OBJECTION
153	Harris County Election Day Polling Location List for November 3, 2020, General and Special Elections. (STATE098178–208).	None
154	Harris County November 8, 2022, General and Special Elections Early Voting Schedule. (STATE170227–28).	None
155	Turnout and Registration Figures, SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/70-92.shtml . (STATE099276–98).	None
156	<i>Bee County Voter Registration Figures</i> , SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/bee.shtml . (STATE107733).	None
157	<i>Bexar County Voter Registration Figures</i> , SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/bexar.shtml . (STATE107734–35).	None
158	<i>Cameron County Voter Registration Figures</i> , SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/cameron.shtml . (STATE107736–37).	None
159	<i>Collin County Voter Registration Figures</i> , SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/collin.shtml . (STATE107738–39).	None
160	<i>Dallas County Voter Registration Figures</i> , SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/dallas.shtml . (STATE107740–41).	None
161	<i>Denton County Voter Registration Figures</i> , SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/denton.shtml . (STATE107742–43).	None

STATE DEFENDANTS' NO.	DESCRIPTION	OBJECTION
162	<i>DeWitt County Voter Registration Figures</i> , SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/dewitt.shtml . (STATE107744).	None
163	<i>El Paso County Voter Registration Figures</i> , SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/elpaso.shtml . (STATE107745–46).	None
164	<i>Fort Bend County Voter Registration Figures</i> , SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/fortbe.html . (STATE107747–48).	None
165	<i>Galveston County Voter Registration Figures</i> , SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/galveston.shtml . (STATE107749).	None
166	<i>Guadalupe County Voter Registration Figures</i> , SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/guadalupe.shtml . (STATE 107750–51).	None
167	<i>Harris County Voter Registration Figures</i> , SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/harris.shtml . (STATE107752–53).	None
168	<i>Hidalgo County Voter Registration Figures</i> , SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/hidalgo.shtml . (STATE107754–55).	None
169	<i>Medina County Voter Registration Figures</i> , SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/medina.shtml . (STATE107756).	None
170	<i>Montgomery County Voter Registration Figures</i> , SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/montgomery.shtml . (STATE107757).	None

STATE DEFENDANTS' NO.	DESCRIPTION	OBJECTION
171	<i>Starr County Voter Registration Figures</i> , SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/starr.shtml . (STATE107758–59).	None
172	<i>Tarrant County Voter Registration Figures</i> , SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/tarrant.shtml . (STATE107760–61).	None
173	<i>Travis County Voter Registration Figures</i> , SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/travis.shtml . (STATE107762–63).	None
174	2020-2021 Voting Assistance Guide, Texas (STATE115160–75).	Lack of foundation/authentication
175	2022-2023 Voting Assistance Guide, Alabama (STATE115060–65).	Lack of foundation/authentication, Hearsay, 401, 403
176	2022-2023 Voting Assistance Guide, Georgia (STATE115074–85).	Lack of foundation/authentication, Hearsay, 401, 403
177	2022-2023 Voting Assistance Guide, Florida (STATE115066–73).	Lack of foundation/authentication, Hearsay, 401, 403
178	2022-2023 Voting Assistance Guide, Hawaii (STATE115086–91).	Lack of foundation/authentication, Hearsay, 401, 403
179	2022-2023 Voting Assistance Guide, Louisiana (STATE115092–99).	Lack of foundation/authentication, Hearsay, 401, 403

STATE DEFENDANTS' NO.	DESCRIPTION	OBJECTION
180	2022-2023 Voting Assistance Guide, Mississippi (STATE115100-07).	Lack of foundation/authentication, Hearsay, 401, 403
181	2022-2023 Voting Assistance Guide, New Jersey (STATE115108-13).	Lack of foundation/authentication, Hearsay, 401, 403
182	2022-2023 Voting Assistance Guide, New Mexico (STATE115114-19).	Lack of foundation/authentication, Hearsay, 401, 403
183	2022-2023 Voting Assistance Guide, North Carolina (STATE115120-29).	Lack of foundation/authentication, Hearsay, 401, 403
184	2022-2023 Voting Assistance Guide, North Dakota (STATE115130-35).	Lack of foundation/authentication, Hearsay, 401, 403
185	2022-2023 Voting Assistance Guide, Pennsylvania (STATE115136-43).	Lack of foundation/authentication, Hearsay, 401, 403
186	2022-2023 Voting Assistance Guide, South Dakota (STATE115144-51).	Lack of foundation/authentication, Hearsay, 401, 403
187	2022-2023 Voting Assistance Guide, Tennessee (STATE115152-59).	Lack of foundation/authentication, Hearsay, 401, 403
188	2022-2023 Voting Assistance Guide, Texas (STATE115176-91).	Lack of foundation/authentication

STATE DEFENDANTS' NO.	DESCRIPTION	OBJECTION
189	2022-2023 Voting Assistance Guide, Virginia (STATE115192–203).	Lack of foundation/authentication, 401, 403
190	2022-2023 Voting Assistance Guide, West Virginia (STATE115204–209).	Lack of foundation/authentication, 401, 403
191	Webpage, <i>State Laws Governing Early Voting</i> , NATIONAL CONFERENCE OF STATE LEGISLATURES (Aug. 8, 2019). (Exhibit 1 – May 2, 2022, Dep. of Dana DeBeauvoir).	401, 403
192	List of Amendment to Senate Bill 1, Texas Legislature Online. (Exhibit 21 – October 6, 2022, Dep. of Sen. Carol Alvarado).	Authenticity, Hearsay, foundation
193	Enrolled version of House Bill 315. An Act Relating to a Statement by the Secretary of State Regarding the Furnishing of Certain Personal Information on an Application for a Ballot to be Voted by Mail, H.B. 315, 88th Leg., R.S. (2023) (STATE182552–55).	None
194	Enrolled version of House Bill 3159. An Act Relating to the Use of an Accessible Absentee Mail System by Certain Voters, H.B. 3159, 88th Leg., R.S. (2023) (STATE182586–91).	None
195	Enrolled version of House Bill 357. An Act Relating to the Requirements to Access the Online Tracker of an Application for a Ballot to be Voted by Mail and to the Date of Runoff Elections, H.B. 357, 88th Leg., R.S. (2023) (STATE182637–40).	None
196	Enrolled version of Senate Bill 1052. An Act Relating to the Compensation of an Election Judge or Clerk, S.B. 1052, 88th Leg., R.S. (2023) (STATE182661–62).	None

STATE DEFENDANTS' NO.	DESCRIPTION	OBJECTION
197	Enrolled version of Senate Bill 1599. An Act Related to Ballots Voted by Mail, S.B. 1599, 88th Leg., R.S. (2023) (STATE182732–43).	None
198	Enrolled version of Senate Bill 477. An Act Relating to Accommodating Voters with a Disability, S.B. 477, 88th Leg., R.S. (2023) (STATE182774–78).	None
199	Enrolled version of Senate Bill 975. An Act Relating to the Procedures for the Issuance of a Personal Identification Certificate to a Person Whose Driver's License is Surrendered, S.B. 975, 88th Leg., R.S. (2023) (STATE182805–06).	None

May Offer

STATE DEFENDANTS' EXHIBIT NO.	DESCRIPTION	OBJECTION
200	Expert Witness Report, Prof. Eitan Hersh, <i>Second Supplement to Report on Identification Number Requirements for Mail Balloting under SB 1</i> . (Served on Feb. 10, 2023).	None
201	Expert Witness Report, Prof. Eitan Hersh, <i>Addendum to Second Supplement to Report on Identification Number Requirements for Mail Balloting under SB 1</i> . (Served on May 8, 2023).	None
202	Election Advisory No. 2022-13, Certain Activities in Vicinity of Polling Places, dated February 14, 2022. (STATE001463–67).	None
203	Election Advisory No. 2022-02, Instructions and Deadlines for Mailing/Emailing Ballots Under the Federal “MOVE Act” for Overseas Voters, dated January 10, 2022. (STATE124074–79).	None

STATE DEFENDANTS' EXHIBIT NO.	DESCRIPTION	OBJECTION
204	Election Advisory No. 2021-14, Re: Impact of Redistricting on Certain Election Deadlines and Procedures, dated November 1, 2021. (STATE001477–82).	None
205	Election Advisory No. 2021-10, Re: NEW LAW: SB 1111 (2021, Regular Session) Address Confirmation Process and Forms, dated August 31, 2021. (STATE098870–72).	None
206	Election Advisory No. 2021-09, Re: 2021 Legislative Summary – 87 th Regular Session, dated July 30, 2021. (STATE098864–69).	None
207	Election Advisory No. 2021-08, Re: November 2, 2021, Election Law Calendar – Last Updated: June 2021. (STATE097826–859).	None
208	Election Advisory No. 2020-27, Re: Minority Language Requirements, dated September 7, 2020. (STATE097824–25).	None
209	Election Advisory No. 2020-17, Re: November 3, 2020, Election Law Calendar – Updated August 2020. (STATE097791–823).	None
210	Election Advisory No. 2019-09, Re: Minority Language Requirements, dated June 25, 2019. (STATE097788).	None
211	Form 5-6, Roster for Voters Hand- Delivering Carrier Envelope, January 2022. (STATE046603)	None

STATE DEFENDANTS' EXHIBIT NO.	DESCRIPTION	OBJECTION
212	Form 5-16, Application for Emergency Early Voting Ballot due to Death in the Family, January 2022. (STATE138843-44).	None
213	Form 5-18, Application for Emergency Early Voting Ballot Due to Sickness or Physical Disability, January 2022 (STATE138169-70).	None
214	Instructions for Form 5-18, Application for Emergency Early Voting Ballot Due to Sickness or Physical Disability, January 2022 (STATE138054).	Authenticity
215	Form 5-19, Application for Emergency Early Voting Ballot Board Due to Sickness of Physical Disability: Instructions for Voter after Marking the Ballot, January 2022 (STATE138171).	Authenticity
216	Form 5-16(b), Request for Updated Annual Application for Ballot by Mail, prescribed by the Secretary of State, October 2022. (STATE185506-07).	None
217	Form 6-15, Carrier Envelope for Early Voting Ballot, May 2022. (STATE123087-89).	None
218	Instructions for Form 6-15, Carrier Envelope for Early Voting Ballot, May 2022. (STATE123085).	Hearsay
219	September 27, 2022, Email from Director of Elections Keith Ingram to Joyce LeBombard, League of Women Voters, Re: Two More Quick Questions. (STATE140777-79).	Authenticity, Hearsay, 401

STATE DEFENDANTS' EXHIBIT NO.	DESCRIPTION	OBJECTION
220	December 9, 2021, Email from Deputy Director J. Scott Wiedmann, Federal Voting Assistance Program, to Legal Director Christina Adkins, Re: RE: [Non- DoD Source] Questions on Carrier Envelopes for FPCA voters. (STATE031889–90).	Authenticity, Hearsay, 401
221	February 1, 2022, Email from Elections Division Attorney Melanie Best and Christina Obermiller, Department of Defense, Federal Voting Assistance Program, Re: FPCA ID Question – FVAP/Obermiller. (STATE04893–94).	Unable to identify exhibit based on description; all objections reserved
222	April 19, 2022, Mass Email from Elections Division Attorney Heidi Martinez to Election Officials, Re: Forms Release 4/19/2022. (STATE123303).	Authenticity, Hearsay, 401
223	July 7, 2022, Mass Email from Director of Elections Keith Ingram to Election Officials, Re: Notice of Court Order and Revised Election Forms (123318–19).	Authenticity, Hearsay, 401
224	August 25, 2022, Mass Email from Secretary of State's Elections Internet account to Election Officials, Re: Important Information for the November 8, 2022, General Election. (STATE124342–44).	Authenticity, Hearsay, 401
225	September 21, 2022, Mass Email from Secretary of State's Elections Internet account to Election Officials, Re: Updated Forms and Resources – Notice of Court Order and Revised Election Forms. (STATE138776–78)	Authenticity, Hearsay, 401
226	October 11, 2022, Mass Email from Legal Director Christina Adkins to Election Officials, Re: Reminder – Webinar Today. (STATE124636–39).	Authenticity, Hearsay, 401
227	Request for Proposal, <i>Voter Education and Outreach Opportunities for 2022 Elections</i> , Secretary of State. (STATE137757–837).	Authenticity, Hearsay, 401, 403

STATE DEFENDANTS' EXHIBIT NO.	DESCRIPTION	OBJECTION
228	Report to the 88th Legislature on the Implementation of Educational Programs to Help Voters with Disabilities Understand How to Use Voting Systems Used in the State of Texas. (STATE137752–56).	Authenticity, Hearsay, 401, 403
229	September 8, 2022, Press Release, <i>SOS 101: Voter Registration in Texas</i> , Texas Secretary of State Press Office (STATE120522–25).	Authenticity, Hearsay, 401, 403
230	October 12, 2022, Press Release, <i>SOS 101: Voting by Mail in Texas</i> , Texas Secretary of State Press Office. (STATE119692–98).	Authenticity, Hearsay, 401, 403
231	September 20, 2022, Press Release, <i>Secretary Scott Marks National Voter Registration Day, Highlights Statewide 'VoteReady' Voter Education Campaign</i> , Texas Secretary of State Press Office. (STATE120634–41).	Authenticity, Hearsay, 401, 403
232	November 7, 2022, Press Release, <i>What to Expect on Election Day in Texas</i> , Texas Secretary of State Press Office. (STATE122811–15).	Authenticity, Hearsay, 401, 403
233	February 9, 2022, Email from Assistant Secretary of State for Communications Sam Taylor to Director of Elections Keith Ingram, Re: Correction to CNN story – incorrect information about new vote by mail ID requirement. (STATE046882–84).	Authenticity, Hearsay, 401, 403
234	Webpage, <i>Voters with Special Needs</i> , EPCOUNTYVOTES.COM, https://epcountyvotes.com/voter_information/voters_with_special_needs . (STATE170217–19).	Authenticity, Hearsay, 401, 403
235	Notice to Voters with Disabilities, Harris County (STATE170319).	Authenticity, Hearsay, 401, 403

STATE DEFENDANTS' EXHIBIT NO.	DESCRIPTION	OBJECTION
236	Webpage, <i>Services Available to Voters with Disabilities in Texas</i> , VOTETEXAS.GOV, https://www.votetexas.gov/voters-with-special-needs/ (STATE099301–04).	Authenticity, Hearsay, 401, 403
237	Webpage, <i>FPCA Ballot Tracker</i> , TEXAS SECRETARY OF STATE, https://web.services.sos.state.tx.us/FPCA/index.aspx . (STATE170224–25).	Authenticity, Hearsay, 401
238	Handbook for Election Judges and Clerks, <i>Qualifying Voters on Election Day 2022</i> , Secretary of State, revised January 2022. (STATE034699–779).	None
239	Poll Watcher's Guide, Secretary of State, revised January 2022. (STATE106313–37).	None
240	Travis County Poll Worker Training Manual (064.134855).	Authenticity, Hearsay
241	Harris County Election Manual 2022–2023. (STATE170320–527).	Authenticity, Hearsay, 401, 403
242	Frequently Asked Questions: Voting in Person (TATUM_005680).	Authenticity, Hearsay, foundation
243	PowerPoint Presentation, <i>Poll Watchers</i> , County Election Officials Election Law Seminar, July 2018 (STATE085635–41).	Authenticity, Hearsay, 401, 403
244	PowerPoint Presentation, <i>Communicating Legislative Changes: ID Requirements for Voting by Mail</i> , NASED Presentation, Secretary of State, February 2023. (STATE177246–68).	Authenticity, Hearsay, 401, 403

STATE DEFENDANTS' EXHIBIT NO.	DESCRIPTION	OBJECTION
245	PowerPoint Presentation, <i>SOS Updates 2021</i> , Secretary of State. (STATE075498–527).	Unable to identify exhibit based on description; all objections reserved
246	PowerPoint Presentation, <i>Elections 101</i> , Secretary of State, July 2020. (STATE085183–232).	Authenticity, Hearsay, 401, 403
247	PowerPoint Presentation, <i>Early Voting in Person Changes</i> , Secretary of State (RFP14_000071).	Unable to identify exhibit based on description; all objections reserved
248	PowerPoint Presentation, FAQs on Applications for Ballot by Mail (ABBM)s, Secretary of State. (STATE061321–24).	None
249	PowerPoint Presentation, <i>Election Reconciliation–Official Totals</i> , Webinar, Secretary of State, March 2022. (STATE019553–72).	Authenticity, Hearsay, 401
250	PowerPoint Presentation, <i>Election Reconciliation Forms</i> , Webinar, Secretary of State, April 2022. (STATE087830–66).	Authenticity, Hearsay, 401, 403
251	PowerPoint Presentation, <i>Election Reconciliation Forms</i> , Webinar, Secretary of State, October 2022. (STATE112370–414).	Lack of foundation/Authenticity; Incomplete Evidence; Hearsay
252	PowerPoint Presentation, <i>Opportunity to Correct Defects on Application for Ballot by Mail and Carrier Envelope</i> , Secretary of State, February 2022. (STATE059522–557).	None
253	PowerPoint Presentation, <i>Training for EVBB/SVC Members on New Ballot by Mail Procedures</i> , Secretary of State, April 2022 (STATE124844–94).	None

STATE DEFENDANTS' EXHIBIT NO.	DESCRIPTION	OBJECTION
254	PowerPoint Presentation, <i>Update from SOS</i> , Secretary of State, August 2022 (STATE111746–83).	Lack of foundation/Authenticity; Incomplete Evidence; Relevance
255	PowerPoint Presentation, <i>Training for EVBB/SVC Members on New Ballot by Mail Procedures: General Election for State and County Officers</i> , Secretary of State, October 2022 (STATE124640–65).	None
256	PowerPoint Presentation, <i>Proactive Communication Strategies for Local Election Officials</i> , Secretary of State, Election Seminar, Secretary of State, November 2022. (STATE148646–70).	Lack of foundation/Authenticity; Incomplete Evidence; Relevance; Hearsay
257	PowerPoint Presentation, <i>Election Forms</i> , Election Seminar, Secretary of State, December 2022. (STATE114273–351)	Lack of foundation/Authenticity; Incomplete Evidence
258	Online Poll Worker Training Program, Secretary of State, January 6, 2016 (STATE081477–98).	Lack of foundation/Authenticity; Incomplete Evidence; Relevance
259	2020 Election Administration and Voting Survey, U.S. Election Assistance Commission. (Exhibit 8 – April 7, 2023, Dep. of Tammy Patrick).	Lack of foundation/Authenticity; Incomplete Evidence; Relevance
260	2020 EAVS Manual, U.S. Election Assistance Commission. (STATE050649–92).	Lack of foundation/Authenticity; Incomplete Evidence; Relevance
261	2018 Election Administration and Voting Survey, U.S. Election Assistance Commission. (STATE114809 – 5059).	None
262	2016 Election Administration and Voting Survey, U.S. Election Assistance Commission. (Exhibit 6 – April 7, 2023, Dep. of Tammy Patrick).	Lack of foundation/Authenticity; Incomplete Evidence; Relevance; Hearsay

STATE DEFENDANTS' EXHIBIT NO.	DESCRIPTION	OBJECTION
263	2014 EAC Election Administration and Voting Survey Comprehensive Report, U.S. Election Commission. (STATE114498–808).	Lack of foundation/Authenticity; Incomplete Evidence; Relevance
264	2010 Election Administration and Voting Survey, U.S. Election Assistance Commission. (STATE114377 – 497).	Lack of foundation/Authenticity; Incomplete Evidence; Relevance
265	Travis County Early Voting Locations for November 3, 2020, General Election (STATE098965).	Lack of foundation/Authenticity; Relevance
266	Travis County Election Day Vote Centers for November 3, 2020, General Election (STATE098974–76).	Lack of foundation/Authenticity; Relevance
267	Travis County Early Voting Locations for March 1, 2022, Primary Election (STATE098963).	Lack of foundation/Authenticity; Relevance
268	Travis County Election Day Vote Centers for March 1, 2022, Primary Election (STATE098966–68).	Lack of foundation/Authenticity; Relevance
269	Travis County Early Voting Locations for May 7, 2022, Local Elections (STATE098964).	Lack of foundation/Authenticity; Relevance
270	Travis County Election Day Vote Centers for May 7, 2022, Local Elections (STATE098969–71).	Lack of foundation/Authenticity; Relevance
271	Kerr County Polling Locations for November 8, 2022, General Election. (STATE170292).	Lack of foundation/Authenticity; Incomplete Evidence; Relevance

STATE DEFENDANTS' EXHIBIT NO.	DESCRIPTION	OBJECTION
272	Election Reconciliation Form for November 8, 2022, General Election, Travis County (064.134709).	Lack of foundation/Authenticity
273	Preliminary Election Reconciliation – Unofficial Totals for March 1, 2022, Primary Elections, Harris County (Exhibit 7 – April 20, 2022, Dep. of Isabel Longoria).	Lack of foundation/Authenticity
274	Election Reconciliation Form for March 1, 2022, Democratic Primary Election, Harris County (Exhibit 8 – April 20, 2022, Dep. of Isabel Longoria).	Lack of foundation/Authenticity
275	Election Reconciliation Form for March 1, 2022, Republican Primary Election, Harris County (Exhibit 9 – April 20, 2022, Dep. of Isabel Longoria).	Lack of foundation/Authenticity
276	Election Reconciliation Form for November 8, 2022, General Election, Harris County (Tatum_005330).	Lack of foundation/Authenticity
277	Election Reconciliation Form for November 8, 2022, General Election, Harris County (STATE170229).	Lack of foundation/Authenticity
278	Harris County Community Partnership Presentation. (TATUM_005753).	Lack of foundation/Authenticity; Incomplete Evidence; Hearsay
279	Reference Manual & Checklist April 2022, Harris County. (STATE098019– 174).	Lack of foundation/Authenticity
280	Poll Worker Training November 8, 2022, General Election, Hays County (STATE181404–45).	Lack of foundation/Authenticity; Relevance

STATE DEFENDANTS' EXHIBIT NO.	DESCRIPTION	OBJECTION
281	Webpage, <i>Countywide Vote Centers Information</i> , DALLASCOUNTYVOTES.ORG, https://www.dallascountyvotes.org/countywide-polling-places (STATE097760–62).	Lack of foundation/Authenticity; Relevance
282	Declaration of Brian Keith Ingram, ECF 43-1, <i>Tex. League of United Latin Am. Citizens v. Abbott</i> , 493 F. Supp. 3d 548, 567 (W.D. Tex. 2020), vacated sub nom. <i>Tex. League of United Latin Am. Citizens v. Hughs</i> , No. 20-50867, 2021 WL 1446828 (5th Cir. Feb. 22, 2021). (STATE098337–40).	Lack of foundation/Authenticity; Relevance
283	Reporters Record, Vol. 2 of 3, October 13, 2020, Hearing on Plaintiff's Application for Temporary Injunction and Defendants Plea to the Jurisdiction, <i>Anti-Defamation League Austin, Southwest, and Texoma Regions v. Abbott</i> , Cause No. D-1-GH-20-005550. (STATE098977–275).	Lack of foundation/Authenticity; Relevance
284	Appellant's Brief, <i>Abbott v. Anti-Defamation League Austin, Southwest, and Texoma Regions</i> , Appellate Cause No. 03-20-00498- CV, 2020 WL 6586318 (Tex. App.—Austin). (STATE097491–600).	Relevance
285	Appellant's Reply Brief, <i>Abbott v. Anti-Defamation League Austin, Southwest, and Texoma Regions</i> , Appellate Cause No. 03- 20-00498- CV (Tex. App.—Austin). (STATE097601–40).	Relevance
286	Order, ECF 63, <i>Hotze v. Hollins</i> , No. 4:20- CV-03709, (S.D. Tex. Nov. 2, 2020), aff'd in part, vacated in part sub nom. <i>Hotze v. Hudspeth</i> , 16 F.4th 1121 (5th Cir. 2021). (Exhibit 12 – May 6, 2022, Dep. of Chris Hollins).	None
287	John Burnett & Marisa Peñaloza, <i>In Rio Grande Valley, Some Campaign Workers Are Paid To Harvest Votes</i> , NPR (July 7, 2015). (STATE107793–808).	Lack of foundation/Authenticity; Relevance

STATE DEFENDANTS' EXHIBIT NO.	DESCRIPTION	OBJECTION
288	Tim Acosta, <i>Judge tosses Kleberg County justice of the peace votes, orders new election</i> , CALLER TIMES (June 26, 2018). (STATE107811–13).	Lack of foundation/Authenticity; Relevance
289	Tim Acosta, <i>Robstown resident pleads guilty to voter fraud, barred from helping in future elections</i> , CALLER TIMES (June 14, 2018). (STATE107836–37).	Lack of foundation/Authenticity; Relevance
290	U.S. Census Bureau's Quick Facts: Harris County, Texas, population estimate July 1, 2021. (Exhibit 46 – October 6, 2022, Dep. of Sen. Carol Alvarado).	Lack of foundation/Authenticity; Relevance
291	<i>Risk for COVID-19 Infection, Hospitalization, and Death by Race/ Ethnicity</i> , CENTER FOR DISEASE CONTROL AND PREVENTION (Apr. 7, 2023), https://www.cdc.gov/coronavirus/2019-ncov/covid-data/investigations-discovery/hospitalization-death-by-race-ethnicity.html . (STATE170541).	Lack of foundation/Authenticity; Relevance
292	Report of the Commission on Federal Election Reform, <i>Building Confidence in U.S. Elections</i> , September 2005. (STATE097647–759).	Lack of foundation/Authenticity; Relevance
293	Transcript of Texas Senate Committee on State Affairs (Part I), August 9, 2021, Hearing, Re: Senate Bill 1. (STATE154280–302).	None
294	Transcript of Texas Senate Committee on State Affairs (Part I), August 9, 2021, Hearing, Re: Senate Bill 1. (STATE154831–77).	None
295	Transcript of Texas Senate Session (Part I), August 11, 2021, Re: Senate Bill 1. (STATE154831–77).	None

STATE DEFENDANTS' EXHIBIT NO.	DESCRIPTION	OBJECTION
296	Transcript of Texas Senate Session (Part II), August 11, 2021, Re: Senate Bill 1. (STATE156701–837).	None
297	Transcript of Texas House Committee on Constitutional Rights and Remedies (Part I), August 23, 2021, Re: Senate Bill 1. (STATE160198–358).	None
298	Transcript of Texas House Committee on Constitutional Rights and Remedies (Part II), August 23, 2021, Re: Senate Bill 1. (STATE162405–462).	None
299	Transcript of Texas House of Representatives Session (Part I), August 26, 2021, Re: Senate Bill 1. (STATE163200–286).	None
300	Transcript of Texas House of Representatives Session (Part II), August 26, 2021, Re: Senate Bill 1. (STATE165397–451).	None
301	Transcript of Texas House of Representatives Session (Part I), August 27, 2021, Re: Senate Bill 1. (STATE166756–772).	None
302	Transcript of Texas House of Representatives Session (Part II), August 27, 2021, Re: Senate Bill 1. (STATE167151–54).	None
303	Transcript of Texas Senate Session, August 27, 2021, Re: Senate Bill 1. (STATE167176–179).	None
304	Transcript of Texas House of Representatives Session, August 31, 2021, Re: Senate Bill 1. (STATE167201–07).	None

STATE DEFENDANTS' EXHIBIT NO.	DESCRIPTION	OBJECTION
305	Transcript of Texas Senate Session, August 31, 2021, Re: Senate Bill 1. (STATE167300-328).	None
306	CONFIDENTIAL 2022 P22 App Rejections (Includes Voters that Cured Rej).xlsx (064.127324)	Authenticity/Lack of Foundation; Incomplete Evidence
307	Summary Exhibit - ABBM application and ballot numbers-20220325T005810Z- 001.zip?ABBM application and ballot numbers\ a_reqexpPM22_full.txt (LUPE_0007719)	Unable to identify exhibit based on description. Reserve all objections
308	ABBM application and ballot numbers - 20220325T005810Z-001.zip?ABBM application and ballot numbers\ a_reqexpPM22_full.txt (LUPE_0007719)	Authenticity/Lack of Foundation; Incomplete Evidence
309	Summary Exhibit - REDACTED - _P322_1_Dallas.xlsx (LUPE_0007734)	Unable to identify exhibit based on description. Reserve all objections
310	REDACTED - _P322_1_Dallas.xlsx (LUPE_0007734)	Authenticity/Lack of Foundation; Incomplete Evidence
311	Summary Exhibit - a_reqexpPM22_full.txt (LUPE_0024430)	Unable to identify exhibit based on description. Reserve all objections
312	a_reqexpPM22_full.txt (LUPE_0024430)	Unable to identify exhibit based on description. Reserve all objections
313	Summary Exhibit - P322_Election.xlsx (HJ_0008945)	Unable to identify exhibit based on description. Reserve all objections

STATE DEFENDANTS' EXHIBIT NO.	DESCRIPTION	OBJECTION
314	P322_Election.xlsx (HJ_0008945)	Authenticity/Lack of Foundation;
315	January 31, 2017, Letter on Results of Audit of November 8, 2016, General Election from Gretchen Nagy, Director, Travis County Voter Registration to Michael Winn, Director, Travis County Clerk Elections Division (383.001691)	Authenticity/Lack of Foundation Incomplete Evidence; Relevance

OBJECTIONS TO INTERVENOR-DEFENDANTS' DEPOSITION DESIGNATIONS

HAUL Plaintiffs object to the following deposition testimony designated by Intervenor-Defendants and counter-designate additional deposition testimony.

Witness: Alan Vera (February 27, 2023)

Designated Testimony (Page:Line)	Objection	Counter-designation (Page:Line)
68:13-21	Hearsay	
71:10-72:11	Foundation, Hearsay	
72:17-24	Hearsay	
73:10-74:13	Hearsay	74:13-20
84:15-25	Foundation	83:25-84:14
85:5-15	Foundation	
85:22-86:2	Foundation	
89:17-19	Foundation	
92:20-93:10	Foundation	
93:25-94:11	Foundation	
105:21-106:9	Foundation	
111:10-17	Foundation	

Witness: Cynthia Siegel (February 28, 2023)

Designated Testimony (Page:Line)	Objection	Counter-designation (Page:Line)
36:11-9	None	37:17-38:10; 44:3-15
62:21-63:8	Foundation	42:20-25; 64:6-65:11; 65:17-66:21

Designated Testimony (Page:Line)	Objection	Counter-designation (Page:Line)
97:4-13; 99:23-100:9		97:14-98:17; 98:20-99:15

Witness: Susan Fountain (April 26, 2023)

Designated Testimony (Page:Line)	Objection	Counter-designation
15:11-14; 27:15-17		58:25-59:2
		90:14-91:11
93:19-94:6		94:6-8
96:5-11; 96:20-97:10	403	95:10-96:4; 96:12-19; 97:11-23; 98:25-99:10
97:24-98:1	Legal conclusion; 403	
101:10-17; 107:16-20	Legal conclusion; 403	100:22-101:9; 101:18-20; 102:1-5; 102:7-10; 102:12- 17; 102:19-24; 103:2-9; 103:10-12; 103:14-16; 103:22-104:1-5; 104:8-13; 104:16-23; 104:25; 106:3- 7; 106:10-13; 106:16-20; 106:24-107:5; 107:11-15
122:17-19	Foundation; 403	

OBJECTIONS TO INTERVENOR-DEFENDANTS' EXHIBITS

Intervenor- Defendants' Exhibit No.	Description	Objection
1	Intervenor-Defendants' Second Supplemental Responses And Objections To Plaintiffs' First Set Of Interrogatories (Apr. 28, 2023)	Foundation, Authenticity, Hearsay
2	August 9, 2021 Email from C. Siegel to Senators, RPCI_0000331-332	Foundation, Authenticity, Hearsay, 403
3	Harris County Republican Party 2021 Election Integrity Resolution, RPCI__0002328-329	Foundation, Authenticity, Hearsay
4	May 5, 2022 Email from M. Scarpello, RPCI_0000361-3666	Foundation, Authenticity, Hearsay, 401

OBJECTIONS TO DEFENDANT OGG'S DEPOSITION DESIGNATIONS**Witness: Isabel Longoria (April 20, 2022)**

Private Plaintiffs have listed Isabel Longoria as “may call” live witness. (ECF No. 687-1.) Absent an agreement among the parties concerning the use of deposition testimony, pursuant to Federal Rule of Civil Procedure 32(a), HAUL Plaintiffs object to Defendant Ogg’s designations of Ms. Longoria’s deposition testimony in their entirety should she appear live at trial. If Ms. Longoria does not provide live testimony, then HAUL Plaintiffs have no objections to the deposition testimony designated by Defendant Ogg.

Witness: Senator Carol Alvarado (October 6, 2022)

No objections.

OBJECTIONS TO DEFENDANT OGG'S EXHIBITS

District Attorney Kim Ogg's Exhibit No.	Description	Objection
1	District Attorney Ogg's March 12, 2022 proposed non-participation stipulation	Foundation, Authenticity, Hearsay, 403
2	OCA Plaintiffs' rejection of District Attorney Ogg's proposed non-participation stipulation via e-mail on March 14, 2022	Foundation, Authenticity, Hearsay, 403
3	District Attorney Ogg's March 21, 2023 First Amended Responses to OCA Plaintiffs' Second Interrogatories	Foundation, Authenticity, Hearsay
4	District Attorney Ogg's March 17, 2023 Responses to the LULAC Plaintiffs' Discovery Requests	Foundation, Authenticity, Hearsay

DATED: August 15, 2023

Respectfully submitted,

/s/ Jennifer Holmes

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was served on August 15, 2023 upon all counsel of record by CM/ECF:

s/ Jennifer A. Holmes
Jennifer A. Holmes